

# Virginia Department of Rail and Public Transportation

## Title VI Plan

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# PROGRAM OVERVIEW

## Introduction

The Virginia Department of Rail and Public Transportation (DRPT) is a “primary recipient” of federal transportation funds. As a regulatory condition of receiving these funds, DRPT is required to administer a program that establishes Title VI goals and objectives which pertains to highway and transportation programs. DRPT’s Title VI Compliance Officer is responsible for implementing and monitoring compliance with the Title VI program.

The focal point of nondiscrimination law is Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin. However, the broader application of nondiscrimination law may be found in other statutes, regulations, and executive orders. Discrimination based on sex, disability, and age is prohibited as well as inequitable treatment of persons as a result of projects which are undertaken with federal financial assistance. The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities whether they are federally funded or not.

In addition to nondiscrimination, this document provides information regarding two Presidential Executive Orders pertaining to fairness and inclusiveness. Executive Order 12898 mandates that federal agencies address equity and fairness, or Environmental Justice, toward low-income and minority persons and populations. Executive Order 13166 mandates that federal agencies ensure that people who have Limited English Proficiency (LEP) have meaningful access to federally-conducted and/or funded programs and activities.

The Title VI Compliance Officer is responsible for initiating and monitoring Title VI activities of all of DRPT’s divisions, all program areas, and oversight of subrecipients. Subrecipients include cities, local governments, or any other entity receiving funds from DRPT.

DRPT is required to protect the public interest by developing a plan for their benefit. In addition, the Title VI plan delineates what DRPT will do to prevent discrimination in federally-funded activities and projects, how it will achieve its objective, and the procedures it will take to monitor Title VI.

Title VI assurances are the foundation of our commitment to nondiscrimination. DRPT monitors its subrecipients for compliance with the principles specifically set forth in the law. DRPT also acknowledges its responsibilities to work toward increased effectiveness regarding Title VI compliance.

## POLICY STATEMENT AND AUTHORITIES

### Title VI Policy Statement

DRPT is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

The DRPT Title VI Compliance Officer is responsible for initiating and monitoring Title VI activities, preparing required reports and other responsibilities, as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.



Signature of Authorizing Official

November 8, 2012

Date

### Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid recipients, subrecipients, and contractors, whether such programs and activities are federally-assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice (DOJ) regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted); U.S. Department of Transportation (DOT) regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted); Joint Federal Transit Administration (FTA)/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, “Environmental Impact and Related Procedures” (August 28, 1987); Joint Federal FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, “Planning Assistance and Standards,” (October 28, 1993, unless otherwise noted); U.S. DOT Order 5610.2, “U.S. DOT Order on Environmental Justice to Address Environmental Justice in

Minority Populations and Low-Income Populations,” (April 15, 1997); U.S. DOT Policy Guidance Concerning Recipients’ Responsibilities to LEP Persons, (December 14, 2005), and Section 12 of FTA’s Master Agreement, FTA MA 13 (October 1, 2006).

#### **Title VI Nondiscrimination Statement**

DRPT ensures compliance with Title VI of the Civil Act of 1964; 49 CFR, Part 21 related statues and regulations to the end that no person shall be excluded from participation in or be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. DOT on the grounds of race, color, sex, or national origin.

#### **Title VI and Other Nondiscrimination Authorities**

Title VI is usually referred to in the context of federal nondiscrimination laws. Title VI is one of 11 titles included in the Civil Rights Act of 1964. The following is a list of all of the Civil Rights Act titles:

- I. Voting Rights
- II. Public Accommodation
- III. Desegregation of Public Facilities
- IV. Desegregation of Public Education
- V. Commission on Civil Rights
- VI. Nondiscrimination in Federally-Assisted Programs and Activities
- VII. Equal Employment Opportunity
- VIII. Registration and Voting Statistics
- IX. Intervention and Procedure after Removal in Civil Rights Cases
- X. Establishment of Community Relations Service
- XI. Miscellaneous

Title VI “declares it to be the policy of the United States that discrimination on the ground of race, color, or national origin shall not occur in connection with programs and activities receiving federal financial assistance and authorizes and directs the appropriate federal departments and agencies to take action to carry out this policy.” Any organization that receives federal funds is bound to comply with Title VI.

In addition to the laws listed above, the following must be taken into account when ensuring compliance with federal nondiscrimination laws, directives, and mandates:

- **Executive Order 12898** – Environmental Justice (February 11, 1994), a presidential mandate to address equity and fairness toward low-income and

minority persons/population. Executive Order 12898 organized and explained the federal government's commitment to promote Environmental Justice. Each federal agency was directed to review its procedures and make environmental justice part of its mission. U.S. DOT Order 5610.2 (April 15, 1997) expanded upon Executive Order 12898 requirements and describes the process for incorporating Environmental Justice principles into DOT programs, policies, and activities. FHWA Order 6640.23 (December 2, 1998) – FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.

- **DOT Order 5610.2** on Environmental Justice summarized and expanded upon the requirements of Executive Order 12898 to include all policies, programs, and other activities that are undertaken, funded, or approved by the FHWA, the FTA, or other U.S. DOT components.
- **Executive Order 13166** – LEP (August 11, 2000), a presidential directive to federal agencies to ensure people who have LEP have meaningful access to services. Executive Order 13166 ensures federal agencies and their recipients to improve access for persons with LEP to federally-conducted and federally-assisted programs and activities.
- **The National Environmental Policy Act (NEPA) of 1969** addresses both social and economic impacts of environmental justice. NEPA stresses the importance of providing for “all Americans, safe, healthful, productive and aesthetically pleasing surroundings,” and provides a requirement for taking a “systematic interdisciplinary approach” to aid in considering environmental and community factors in decision-making.
- **FHWA/FTA Memorandum Implementing Title VI Requirements in Metropolitan and Statewide Planning** - This memorandum provides clarification for field officers on how to ensure that environmental justice is considered during current and future planning certification reviews. The intent of this memorandum was for planning officials to understand that environmental justice is equally as important during the planning stages as it is during the project development stages.

## ORGANIZATION AND COMPLIANCE RESPONSIBILITIES

As a State agency reporting to the Secretary of Transportation, DRPT works closely with the Virginia DOT, which is responsible for highways, as well as other transportation agencies responsible for aviation and ports. Each of DRPT's three

primary areas of activity (rail, public transportation, and commuter services) focuses on the movement of people and goods throughout Virginia.

Public Transportation systems help manage traffic congestion and provide transportation choices while safely transporting people to destinations across the Commonwealth. There are 60 public transportation systems in Virginia that range in size from two-bus programs in small towns to larger regional systems like the Washington Metropolitan Area Transit Authority (Metrorail) in Northern Virginia and Hampton Roads Transit in Hampton Roads. There are 54 human transportation services in Virginia. By advising, supporting and funding public transportation programs statewide, DRPT helps provide safe, reliable transportation options for everyone.

### **Staff Responsibilities**

To ensure the implementation of the Title VI Plan, the following responsibilities have been identified for the Title VI Compliance Officer. An Organizational Chart for key departments within DRPT can be found in Appendix A. DRPT's Title VI Compliance Officer is responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

#### *Title VI Compliance Officer*

The Title VI Compliance Officer oversees the Title VI Program, providing day-to-day guidance and support. The Title VI Program is located in the Office of the Title VI Compliance Officer. The Title VI Compliance Officer, who reports directly to the DRPT Director, is charged with the responsibility for training, implementing, monitoring, investigating and resolving Title VI complaints, ensuring DRPT and its subrecipients are in compliance with Title VI regulations, and reporting on DRPT's compliance with Title VI regulations. Other staff members are expected to provide information and support to assist this staff member perform his or her tasks. In support of this, the Title VI Compliance Officer will:

#### **Oversight of Nondiscrimination Regulations & Procedures**

- Develop and coordinate the implementation of DRPT's Title VI and Nondiscrimination Program
- Process, investigate, and resolve all Title VI complaints in accordance with the Title VI complaint procedure and time limitation
- Coordinate the Title VI and Nondiscrimination Program with all DRPT Divisions and other program area managers or designees, including subrecipients
- Prepare annual reports to FTA of Title VI accomplishments for the year and goals for the next year



- Resolve any deficiencies which may be discovered in DRPT's Title VI/Nondiscrimination Program
- Collect statistical data necessary to evaluate the effectiveness of compliance with Title VI requirements of DRPT's subrecipients
- Monitor DRPT procedures and programs for compliance with Title VI requirements in all program areas
- Establish procedures for resolving Title VI problem areas
- Conduct reviews of program areas and subrecipients annually to determine the effectiveness of Title VI programs
- Advice on Title VI matters
- Review DRPT's divisions and subrecipients' procedures and guidelines as they relate to various program directives, manuals, and other regulations to determine compliance with Title VI Civil Rights provisions. Where corrections are necessary, the Title VI Compliance Officer coordinates with the appropriate actions
- Provide and prepare data, information, and reports as requested by DRPT's Director
- Maintain knowledge of and adhere to DRPT's Title VI and Nondiscrimination Program
- Maintain a list of Interpretation Service Providers
- Review DRPT's divisions and subrecipients procedures for Title VI compliance
- Process Title VI complaints received by DRPT, in accordance with the agency's Nondiscrimination Complaint Procedures
- Make recommendations on corrective action
- Conduct on-site and desk-audit reviews
- Identify deficiencies and remedies in subrecipients Title VI Program
- Coordinate with appropriate federal and state entities to periodically provide DRPT employees with training opportunities regarding nondiscrimination

### **Communications and Public Outreach & Participation**

- Develop Title VI information for dissemination to the public in its education and outreach program, where appropriate
- Coordinate and schedule teleconferences with Rural Transit Providers, Metropolitan Planning Organizations (MPOs) etc.
- Review Public Meeting transcripts for Environment Justice and Title VI issues

## **Education and Training**

- Coordinate and schedule special Title VI Training
- Serve as Title VI Training Coordinator
- Conduct Title VI training and provides technical assistance
- Assist subrecipients (contractors, consultants, suppliers, vendors, universities, colleges, planning agencies, cities, counties and all DRPT's Divisions) in devising and implementing Title VI programs

## ***Questions***

For questions on DRPT's Title VI Plan and procedures, please contact the Title VI Compliance Officer, Linda Maiden, at (804) 786-4400 or by email at [drptpr@drpt.virginia.gov](mailto:drptpr@drpt.virginia.gov). For information on DRPT's work, programs, or publications, please see DRPT's website at [www.drpt.virginia.gov](http://www.drpt.virginia.gov).

## **Annual Review of Title VI Program**

Each year, in preparing for the Annual Report and Updates, the Title VI Compliance Officer will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

## **Title VI Clauses in Contracts**

In all procurements requiring a written contract, DRPT's contract will include the federal non-discrimination clauses. The Title VI Compliance Officer will work with the Financial Compliance and Procurement Analyst.

## **ENVIRONMENTAL JUSTICE**

On February 11, 1994, President William J. Clinton signed **Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations**, which directs federal agencies to develop strategies to help them identify and address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations. The Executive Order was also intended to provide minority and low-income communities with access to public information and opportunities for public participation in matters relating to human health or the environment.

Adverse effects as described in Executive Order 12898 is the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to:

- Bodily impairment, infirmity, illness or death.
- Air, noise, and water pollution and soil contamination.
- Destruction or disruption of:
  - man-made or natural resources
  - aesthetic values
  - community cohesion or a community's economic vitality
  - the availability of public and private facilities and services
- Adverse employment effects.
- Displacement of persons, businesses, farms, or non-profit organizations.
- Increased traffic congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community.
- Denial of, reduction in, or significant delay in the receipt of benefits of DRPT programs, policies, or activities.

Environmental Justice joins social and environmental movements by addressing the unequal environmental burden often borne by minority and low-income populations. The right to a safe, healthy, productive, and sustainable environment for all, where "environment" is considered in its totality to include the ecological (biological), physical (natural and built), social, political, aesthetic, and economic environments.

Environmental Justice helps to ensure that programs, policies, and activities that have adverse effects on communities do not affect minority and low-income populations disproportionately. To prevent discrimination as described in Executive Order 12898, the FHWA Order 6640.23 *Order To Address Environmental Justice in Minority Populations and Low-Income Populations* dated December 2, 1998 defines minority and low-income individuals and populations as follows:

- **Minority** – a person who is Black, Hispanic, American Indian and Alaskan Native, or Asian American:
  - **Black** – a person having origins in any of the black racial groups of Africa.

- **Hispanic** – a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- **American Indian and Alaskan Native** – a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition.
- **Asian American** – a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific islands.
- **Minority Population** – any readily identifiable groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed program, policy, or activity.
- **Low-Income** – a person whose household income is at or below the United States Department of Health and Human Services poverty guidelines.
- **Low-Income Population** – any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who would be similarly affected by a proposed program, policy, or activity.

Environmental Justice is incorporated through all phases of the transportation planning and programming process. Environmental Justice Guidelines for DRPT have been developed and are included within the updated DRPT Public Participation Plan (see Appendix B), and within the VTrans2035 Plan. DRPT's Environmental Justice Guidelines include maps identifying underserved communities, outreach strategies, benefits/burdens methodologies, and an evaluation component.

## LIMITED ENGLISH PROFICIENCY

On August 11, 2000, President William J. Clinton signed **Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency**. The Executive Order requires federal agencies to examine the services they provide, identify any need for services to those with LEP, and develop and implement a system to provide those services so LEP persons can have meaningful access to them. The Executive Order also requires that federal agencies work to ensure that recipients of federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or LEP. For an LEP individual, language can present a barrier to accessing benefits and services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally-funded programs and activities. These individuals may be entitled to language assistance at no cost to them with respect to a particular type of service, benefit, or encounter.

The following LEP language implementation plan, developed by DRPT is based on FTA guidelines. The guidelines require that recipients of federal financial assistance provide “meaningful access to programs and activities” by giving LEP persons adequate and understandable information and allowing them to participate in programs and activities, where appropriate. Recipients of federal funds must take reasonable steps to remove barriers for LEP individuals.

As required, DRPT developed a written LEP Plan. Using 2010 and American Community Survey (ACS) Census data, DRPT has evaluated data to determine the extent of need for translation services of its vital documents and materials.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit. Therefore, it also makes good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

1. Demography: number and/or proportion of LEP persons served and languages spoken in service area.
2. Frequency: rate of contact with service or program.
3. Importance: nature and importance of program/service to people’s lives.
4. Resources: available resources, including language assistance services.

The four-factor analysis was used to determine which language assistance services are appropriate to address the identified needs of the LEP population. More information regarding the identification of LEP individuals within the community as well as outreach strategies are included within the DRPT LEP Plan.

## Assessment of Needs and Resources

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

### ***Factor 1: Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population***

The agency has reviewed Census data on the number of individuals in its service area that have LEP, as well as the languages they speak.

#### **U.S. Census Data – American Community Survey (2006-2010)**

Data from the U.S. Census Bureau's ACS were obtained through [www.census.gov](http://www.census.gov) for the Commonwealth. Information from the 2006-2010 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

DRPT used this data to determine how best to disseminate information that is accessible to persons with LEP. According to the U.S. Census 2006-2010 ACS, English was the only language spoken by 6,299,127 people, or 85.87% of the population as displayed in Table 1. The LEP four factor analysis shows 200,871 people, or 2.74% of the population, in Virginia do not speak English “well” or “at all”. Based on the relatively low percent statewide, the need to address the LEP population is somewhat limited.

**Table 1 - Virginia's Language Use and English-Speaking Ability for the Population Five Years and Older**

Population Five Years and Older	Speak English at Home	Speak non-English at Home							
		Total Population	Percent of Population	Ability to Speak English				Speak Spanish	Speak Other
				"Very Well"	"Well"	"Not Well"	"Not at All"		
7,335,505	6,299,127	1,036,378	14.13%	620,981	214,526	151,773	49,098	469,303	567,075

The Spanish speaking classification makes up approximately 6% (6.4%) of the total population, and is, by far, the largest LEP group in Virginia. All DRPT service requests have been for Spanish translation. Therefore, DRPT's focus will be on targeting this community. Language assistance will be made available to other limited English speaking individuals in the community as the need arises.

This exercise revealed that 27 counties and cities (out of 134) have more than 1,000 individuals who speak English “not well” or “not at all”. From this group, in only eight of the jurisdictions, the LEP language group constitutes 5% of the population. Most areas with the five percent concentrations are in urban areas, and five out of the seven are located in the D.C. suburbs. Figure 1 provides a map of Virginia and highlights these counties and cities.

***Factor 2: Assessment of Frequency with Which LEP Individuals Come Into Contact with the Transit Services or System***

DRPT reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through the following channels:

- Public involvement and public engagement meetings/hearings for projects affecting LEP communities or individuals
- Transit subrecipients
- Internet access: DRPT Website must be accessible to LEP persons
- DRPT’s phone communications: notices/greetings in languages other than English
- Visits to DRPT’s office(s)

We will continue to identify emerging populations as updated Census and ACS data become available for the Commonwealth. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact.

***Factor 3: Assessment of the Nature and Importance of the Transit Services to the LEP Population***

DRPT’s main function is to support cooperative, comprehensive, and continuing public transportation planning and services as outlined in federal transportation acts. In doing so, DRPT develops the Six-Year Improvement Program (SYIP), Public Transportation and Transportation Demand Management Grant Program Application Guidance, and as needed other studies. Another key function is oversight of their subrecipients.





- The SYIP is a plan that includes funding for public transportation facilities and commuter and public transportation programs intended to be implemented through a combination of State, federal, and local funding.
- The Public Transportation and Transportation Demand Management Grant Program Application Guidance provides application guidance regarding the various state and federal public transportation grant programs administered by DRPT. The document contains two major parts:
  1. An overview of the grant programs administered by DRPT, a description of DRPT's public transportation investment policy, and a calendar describing each step in the grant application process.
  2. A description of each grant program including: eligible recipients and expenses, match ratios, application evaluation criteria, and the application procedure.
- DRPT is required by the FTA to ensure that recipients of FTA assistance comply with federal requirements. To meet this federal mandate, DRPT conducts periodic reviews of its grantees. Additional objectives of the reviews are to ensure compliance with state requirements, encourage progress, and identify training and technical assistance needs.

DRPT's most critical services are those related to funding public transportation, public involvement (public information or planning meetings), and the ability to file complaints. LEP persons, low-income populations, minority populations, the elderly, and the disabled must be considered in these processes. DRPT will continue assessing this area by communicating with community organizations that serve LEP persons, as well as contact with LEP persons themselves.

***Factor 4: Assessment of the Resources Available to the Agency and Costs***

DRPT serves the entire State of Virginia and is required by federal law to provide access to LEP persons, and to ensure that its subrecipients also provide access. Even subrecipients with very limited resources should have an LEP section in their Title VI Plan with the acknowledgment that demographics change yearly and indicate the number of LEP persons may increase within their specific planning area.

Costs must be factored into this balancing test as part of the consideration of "resources available." Reasonable steps may cease to be reasonable when the costs imposed substantially exceed the benefits in light of the factors outlined in the U.S. DOJ LEP Guidance. In this case, the needs have been prioritized so that language services are targeted where most needed because of the nature and importance of the activity

involved. However, LEP persons have the right to language assistance at no cost to them in their spoken language.

To date, DRPT, in coordination with the Virginia DOT and its subrecipients have expended considerable funds on language services. Language assistance actions include:

- MPO and local subrecipients, with assistance from DRPT, that have their own plans
- Google Translate available on DRPT's website for translation of vital documents
- Translation of vital documents upon request
- Training
- VDOT's language service contractor

#### **LEP Implementation Plan**

Considering DRPT's size and scope, LEP individuals in DRPT's statewide services area, and financial resources, it is necessary to provide at least the most basic and cost-effective services available to ensure compliance with Executive Order 13166. Many options were discussed and considered by DRPT staff and the following recommendations were adopted as measures to provide meaningful access to limited English speaking persons:

- Publish the LEP Plan and vital document materials on DRPT's website in languages other than English as warranted.
- Disseminate the LEP Plan to community organizations, governmental entities, and other interested persons; also in languages other than English.
- With advance notice of seven calendar days, provide interpreter services at any meeting or public hearing. This will include foreign language and hearing impaired interpreter services.
- Place statements in notices and publications that interpreter services are available for meetings, with seven days advance notice.
- Place notices of DRPT's non-discrimination policies and information on the local and federal complaint process on the website in English and other languages via Google Translate and make the notices available at public meetings.

- Translate vital documents in languages other than English according to the safe harbor provision.
- Provide training to DRPT staff on the requirements for providing meaningful access to services for LEP persons.
- Monitor subrecipients to ensure LEP requirements are fulfilled and report annually on the accomplishments related to LEP activities.
- Include a LEP policy in the updates of DRPT's Public Participation Plan through, 1) statements and notices that interpreters will be provided, upon prior request for language assistance as well as for sign language, and 2) maintenance of a contact list for interpretation and translation providers.
- Utilize VDOT's LEP Guidelines and Public Participation Plan in conjunction with DRPT's LEP Plan to identify low-income populations, minority populations, the elderly, and the disabled; who may be part of the LEP population.

## **PUBLIC OUTREACH AND INVOLVEMENT**

Public outreach and involvement applies to and affects DRPT's mission and work program as a whole. The overall goal of DRPT's public outreach and involvement policy is to secure early and continuous public notification about, and participation in, major actions and decisions by DRPT. In seeking public comment and review, DRPT makes a concerted effort to reach all segments of the population, including people from minority and low-income communities, persons with LEP and organizations representing these and other protected classes. DRPT utilizes a broad range of public outreach information and involvement opportunities, including a process for written comments, public meetings after effective notice, settings for open discussion, information services, and consideration of and response to public comments.

It should be noted that Public Outreach and Involvement was a finding on DRPT's August 30 – September 1, 2011 FTA Title VI Audit. DRPT has been negligent in keeping records and documenting our public outreach. Going forward DRPT has set into place procedures for maintaining documentation on a shared server for access by multiple staff members. We also put in place Google Translate on our website to allow access by that population in which English is not their first language.

### **Public Outreach Activities**

DRPT participates in public hearings with VDOT. To stay in conformance with FTA's regulations regarding Title VI, DRPT will work individually with the media to alert the public on upcoming events which is detailed in DRPT's Inclusive Public Participation Plan. In order to reach the highest number of minority and/or low-income people when planning public meetings, DRPT and/or its subrecipients shall attempt to hold meetings near bus lines or other modes of public transportation or in neighborhoods identified as having a high percentage of minority/low-income populations. These locations will be given highest priority depending on availability of meeting space and/or cost of facility.

DRPT posts its Title VI notice on press releases, media releases, and notices to the public. An example of such notices includes: grant application notices, SuperNoVA Transit /TDM Vision Plan Kick-off; Super NoVA Public Meeting Announcement; VTRANS 2035 Open House announcement; and other similar documents.

#### *Demographic Profile*

Data from the US Census was used to develop a demographic profile of the metropolitan planning area and identify the locations and needs of socioeconomic groups, including low-income, disabled, LEP, and minority populations.

DRPT believes that public input into its process is valuable and makes its products better. Transportation planning cannot, and should not, be based simply upon technical analysis. The qualitative information derived from citizen involvement is essential to good decision-making.

As a matter of DRPT policy and a requirement of federal law, the transportation planning process must make special efforts to consider the concerns of traditionally underserved communities, including low-income and minority communities and people with disabilities. These communities are mapped for the Commonwealth in Figures 2 and 3.

To reach the largest number of minority and low-income communities throughout the Commonwealth, a geographically focused public participation program will achieve the outcomes described in this plan. In addition to traditional methods of communication, DRPT will utilize strategies recommended by community members for a specific neighborhood or population group. By partnering with community groups and local Chambers of Commerce, DRPT can cost-effectively extend its reach and help partner organizations provide information that is of interest to groups they represent.

DRPT will establish and maintain active work relationships with all relevant local media, including minority-based media in order to communicate pertinent information to DRPT subrecipients and the public. DRPT will coordinate with

individual institutions and organizations while implementing community-based public involvement strategies to reach out to members in affected minority and/or low income communities. DRPT shall also provide opportunities for public participation through alternative means other than public meetings or written communication; i.e., personal interviews or use of audio or video recording to capture comments and posting that audio/video on DRPT's website.

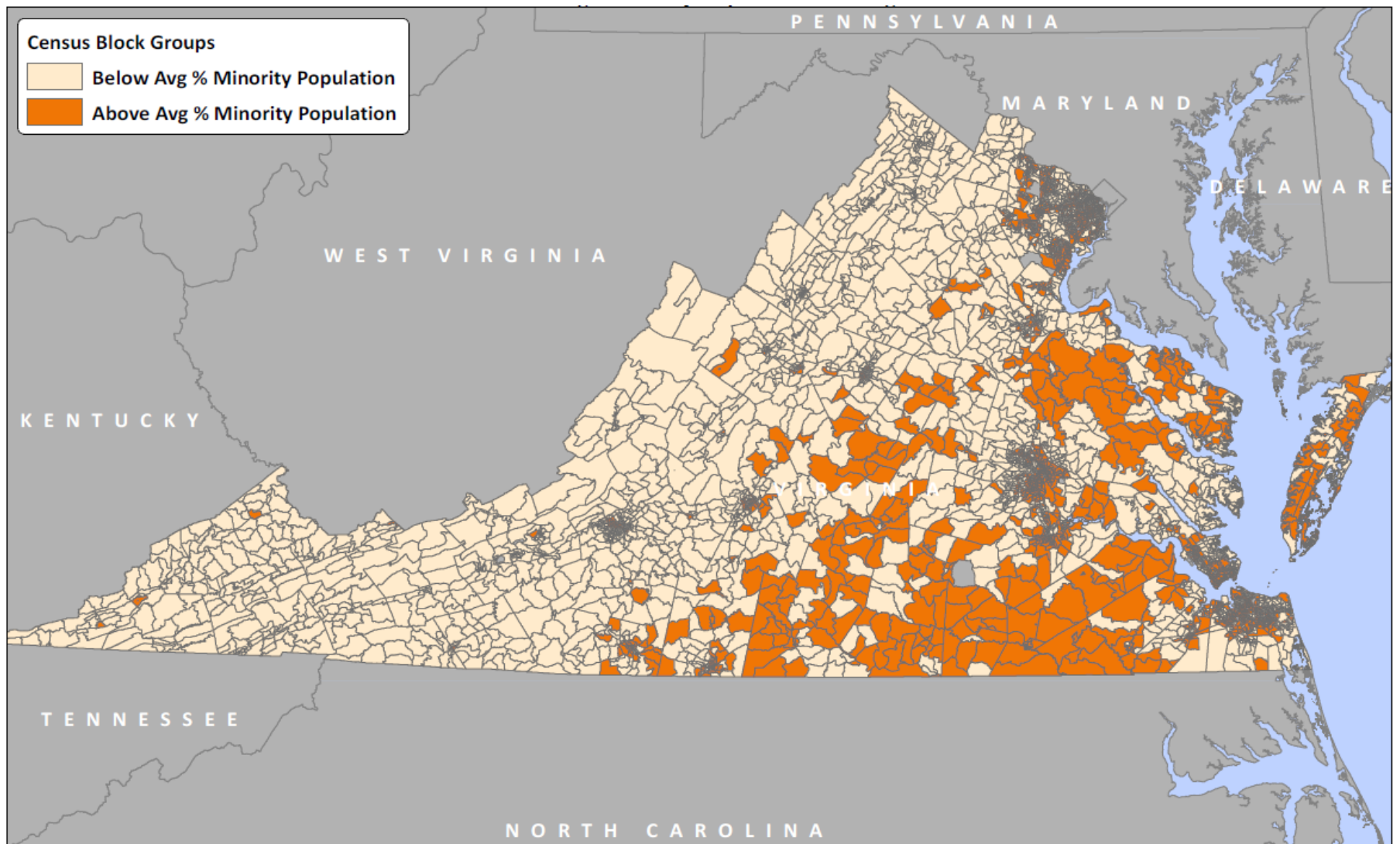


Figure 2 - Percentage of Minority Population for Virginia

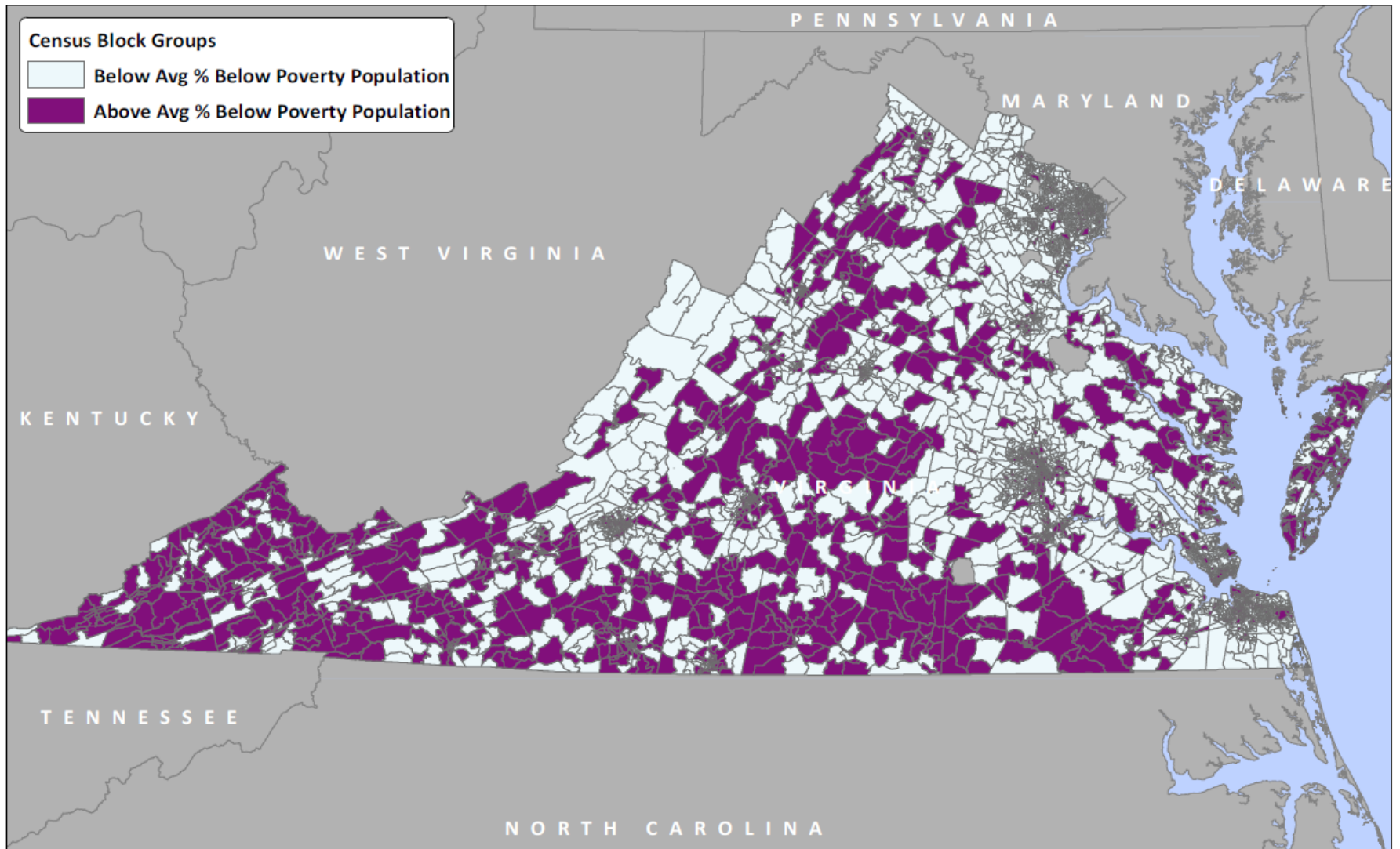


Figure 3 - Percentage Below Poverty Population for Virginia

Subrecipients must put procedures into place to involve minority, low-income, and LEP populations in their public involvement activities. These procedures must be in compliance with FTA regulations. Subrecipients must submit their procedures to DRPT with their Title VI plan. Eligibility for funding through DRPT is contingent on each subrecipient participating in the Federal Title VI program and ensuring that each is in compliance with FTA regulations. DRPT completed Triennial Reviews of its 5311 subrecipients in 2010. The Title VI program was a part of these reviews. Appendix C is the section from the Review Workbook. Appendix D is a summary of the reviews with any corrective action taken by the subrecipient for Title VI deficiencies.

DRPT's outreach notifications include:

- Working with community-based organizations, libraries, Division of Motor Vehicle, and other stakeholders to inform LEP individuals of recipients' services, including the availability of language assistance services.
- Providing presentations and/or notices at schools and religious organizations.

The above activities are the responsibility of the Manager of Communications.

## **DRPT TITLE VI PROGRAM**

DRPT ensures compliance with all applicable nondiscrimination authorities and with regard to the following:

- Communications and Public Outreach & Participation
- Planning and Programming
- Environmental Justice
- Consultant Contracts
- Education and Training
- Administration of Federal/State Transit Grants (covered in next section)

In addition to the responsibilities listed in this section, DRPT staff responsibilities may include reviewing Title VI guidelines and procedures for DRPT's Title VI Plan, and incorporating Title VI-related language and provisions into DRPT documents, as appropriate.

### **Communications and Public Participation**

As described in DRPT's Public Participation Plan, since transportation has a direct and personal impact on the population of a region and is of critical importance to



economic vitality and quality of life, DRPT continually endeavors to provide citizens, affected public agencies, and other interested parties with reasonable opportunities to be involved in the transportation planning process. The DRPT Public Participation Plan includes specific information regarding outreach and communication strategies and detailed Environmental Justice guidelines. Special emphasis is placed on outreach strategies for minority, low-income, and LEP populations.

### ***DRPT Actions***

DRPT staff is responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of DRPT's public participation process.

- Ensure that all communications and public participation efforts comply with nondiscrimination authorities.
- Develop and distribute information on nondiscrimination and DRPT programs to the general public.
- Include the following statement in all of DRPT's public notices:

*DRPT will strive to provide reasonable accommodations and services for persons who require special assistance to participate in this public involvement opportunity. Contact the Title VI Compliance Officer at (804) 786-4400 for more information.*

- Include the following Title VI Statement to the Public in relevant press releases, in public notices, and in published documents.

*The Department of Rail and Public Transportation (DRPT) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.*

*For additional information on DRPT's nondiscrimination policies and procedures or to file a complaint, please visit the website at [www.drpt.virginia.gov](http://www.drpt.virginia.gov) or contact the Title VI Compliance Officer, Linda Maiden, 600 E. Main Street, Suite 2102, Richmond, VA 23219.*

- Appendix E contains three maps on which transit service is overlaid. These maps depict percent of minority population by county; percent of population living with limited English proficiency; and percent of county residents earning less than 50% of the county median income.

### **Planning and Programming**

DRPT is responsible for developing and overseeing long- and short-range transportation plans and programs to provide efficient transportation services for the Commonwealth. A comprehensive transportation process is used which entails the monitoring and collection of various data pertaining to transportation issues. DRPT coordinates with VDOT, cities, counties, and area transit agencies; seeks public participation; and provides technical support when needed. An outreach plan for long-range transportation plan updates is included within the Public Participation Plan.

### ***DRPT Action***

DRPT staff is responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of DRPT's planning and programming processes.

- Ensure that all aspects of the planning and programming process operation comply with nondiscrimination authorities.
- Prepare and update a demographic profile of the Commonwealth using the most current and appropriate statistical information available on race, income, and other pertinent data.
- Make the document available to the public and member agencies on the DRPT website or in hard copy format, if requested.
- Continue to ensure that staff makes concerted efforts to involve members of all social, economic, and ethnic groups in the planning process.

### **Environmental Justice**

The concept of Environmental Justice includes the identification and assessment of disproportionately high and adverse effects of programs, policies, or activities on minority and low-income population groups. Within the context of statewide and regional transportation planning, Environmental Justice considers the relative distribution of costs and benefits from transportation investment strategies and policies among different segments of society.

### ***DRPT Action***

DRPT staff is responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of DRPT efforts to address Environmental Justice.

- Ensure that all aspects of efforts to address Environmental Justice comply with nondiscrimination authorities.
- Conduct an Environmental Justice analysis during the development of the Long-Range Transportation Plan.
- Prepare and update a demographic profile of the region using the most current and appropriate statistical information available on race, income, and other pertinent data.
- The updated DRPT Public Participation Plan includes Environmental Justice guidelines, which outlines outreach strategies for minority, low-income, and LEP populations during the development and implementation of DRPT plans and programs.
- Disseminate information to the public on the processes used and findings of any analysis, in accordance with all DRPT public participation procedures.

Further, during the previous three year period, DRPT participated in three construction projects undertaken by our subgrantees. All three projects received Categorical Exclusions (CE) from FTA. Those projects and the CE dates are listed below:

- Bay Aging Maintenance and Administrative Facility, Gloucester County
  - CE dated August 23, 2010
- Farmville Maintenance Facility
  - CE dated June 7, 2011
- Virginia Regional Transit Administrative and Storage Facility, Loudoun County
  - CE dated February 11, 2011

#### **Consultant Contracts**

DRPT is responsible for selection, negotiation, and administration of its consultant contracts. DRPT operates under its internal contract procedures and all relevant federal and state laws.

#### ***DRPT Action***

DRPT staff is responsible for evaluating and monitoring consultant contracts for compliance with nondiscrimination authorities.

- Ensure inclusion of nondiscrimination language in contracts and Requests for Proposals (RFPs).
- Review consultants for compliance as described below:

- Ensure that all consultants verify their compliance with nondiscrimination authorities, procedures, and requirements.
- If a recipient or subrecipients is found to be not in compliance with nondiscrimination authorities, the Title VI Compliance Officer and relevant staff will work with the recipient or subrecipient to resolve the deficiency status and write a remedial action if necessary.
- Review outreach activities to ensure small, disadvantaged, minority, women, and disabled veteran businesses are not excluded to participate in opportunities to compete for consulting contracts.

### **Education and Training**

In an effort to continuously improve DRPT's overall compliance posture, nondiscrimination training will be coordinated with FTA and VDOT, and made available to DRPT staff and subrecipients on an ongoing basis to ensure up-to-date knowledge of Title VI and other nondiscrimination statutes.

#### ***DRPT Action***

Under the category of education and training, nondiscrimination responsibilities include:

- Distribution of information to DRPT staff and subrecipients on training programs regarding Title VI and related statutes.
- Tracking staff and subrecipient participation in nondiscrimination training.
- Maintain and update nondiscrimination training as necessary.
- Maintain and update DRPT's Title VI Plan as necessary.

## **TITLE VI MONITORING AND REVIEW PROCESS**

DRPT is responsible for administering federal and State funds for planning and operation. Subrecipients of these programs include MPOs, Section 5311, Section 5310, Section 5316, and Section 5317 programs.

DRPT utilizes a staggered monitoring process to accomplish its mission of reviewing and monitoring DRPT's subrecipients for compliance. DRPT evaluates the past performance of its subrecipient's Title VI program and based on the viability of the program, the entity is placed on a three-year review cycle. All findings,

recommendations, and progress made in implementing corrective action is documented and maintained in the respective subrecipient's file.

### **Metropolitan Planning Organizations**

Federal law requires all urbanized areas of 50,000 or greater population to maintain a continuing, comprehensive, and cooperative transportation planning process. The organization responsible for this process is called a Metropolitan Planning Organization. The MPO responsibilities are administered by an Executive Board and a Technical Committee. The Executive Board provides policy direction and the membership includes locally-elected officials and the Governor of Virginia. The Technical Committee provides technical expertise and is comprised of professional planners and engineers from local governments and other transportation related agencies.

The MPO Long Range Transportation Plan is a 20-year plan of long- and short-range strategies and actions for an integrated intermodal transportation system to facilitate the efficient movement of people and goods. The MPO Transportation Improvement Program is a four year schedule of all federally-funded and regionally significant transportation projects to be implemented in the urban area. The MPO Unified Planning Work Program is a one-year schedule of all urban transportation planning activities. It documents work to be performed with federal planning funds.

Formal Public Involvement Programs have been adopted in each area as a means of proactively involving the public in transportation planning. The public is invited to review and comment on proposed transportation plans and programs. MPO meetings are open to the public and serve as a regular forum to solicit community transportation concerns.

### ***DRPT Action***

DRPT annually reviews the Title VI activities for the MPOs. The following items are considered in the review and are reported to the FTA in DRPT's annual Title VI update:

- Strategies used to ensure that all components of the transportation planning process comply with Title VI;
- Whether a demographic profile of the region that includes identification of minority and low-income populations has been developed;
- Whether a process has been developed to identify the needs of minority and low-income populations and whether demographic information has been used to assess the distribution of benefits across these groups;
- Whether there is an analytical process in place to assess the benefits/burdens of transportation system investment on minority and low-income populations, and what data source and tools are used to support such an analysis;
- Whether there is a public involvement strategy for engaging minority and low-income populations in transportation decision-making and reducing participation barriers;
- Whether the public involvement process is routinely evaluated and whether any efforts were made to improve the process, especially with regard to minority and low-income populations;
- Efforts made to engage minority and low-income populations in the public outreach effort and public outreach efforts made to utilize media targeted to these groups;
- Methods used to ensure that issues/concerns raised by minority and low-income populations as well as other affected groups are considered in the decision-making process;
- Number of consultant planning agreements awarded and the dollar value; number of female and minority-owned firms with dollar value;
- Methods used to encourage the use of female and minority planning contractors and subcontractors;
- Status of any Title VI complaints received regarding transportation planning or the public involvement process; and
- Any significant accomplishments made during the review period.

#### **Rural Transit Program**

Section 5311 is a rural transportation grant program providing federal funds to DRPT for state administration, planning, technical assistance, capital operating, and project administration assistance in areas with population less than 50,000. The annual federal allocations are based on the non-urbanized population, the number of vehicles, and counties in the service area.

The goal of the program is to provide the following services to communities with population less than 50,000:

- Enhance the access of people in non-urbanized areas to health care, shopping, education, employment, public services, and recreation.
- Assist in the maintenance, development, improvement, and use of public transportation systems in non-urbanized areas.
- Encourage and facilitate the most efficient use of all transportation funds used to provide passenger transportation in non-urbanized areas through the coordination of programs and services.
- Assist in the development and support of intercity bus transportation.
- Provide for the participation of private transportation providers in non-urbanized transportation.

### *DRPT Action*

DRPT annually reviews the Title VI activities for rural transit systems. The following items are considered in the review and are reported to FTA in DRPT's annual Title VI update:

- Strategies used to ensure that all components of the transportation planning process comply with Title VI;
- Whether a demographic profile of the service area that includes identification of minority and low-income populations has been developed.
- Whether a process has been developed to identify the needs of minority and low-income populations and whether demographic information has been used to assess the distribution of benefits across these groups;

- Whether there is an analytical process in place to assess the benefits/burdens of transportation system investment on minority and low-income populations, and what data source and tools are used to support such an analysis;
- Whether there is a public involvement strategy for engaging minority and low-income populations in transportation decision-making and reducing participation barriers;
- Whether the public involvement process is routinely evaluated and whether any efforts were made to improve the process, especially with regard to minority and low-income populations;
- Efforts made to engage minority and low-income populations in the public outreach effort and public outreach efforts made to utilize media targeted to these groups;
- Methods used to ensure that issues/concerns raised by minority and low-income populations as well as other affected groups are considered in the decision-making process;
- Number of consultant planning agreements awarded and the dollar value; number of female and minority-owned firms with dollar value;
- Methods used to encourage the use of female and minority planning contractors and subcontractors;
- Status of any Title VI complaints received regarding transportation planning or the public involvement process; and
- Any significant accomplishments made during the review period.

#### **Non-Profit Transportation Providers**

Elderly and Disables (Section 5310), Job Access and Reverse Commute (Section 5316), and New Freedom Program (Section 5317) provides grants for on-profit organizations providing transportation services for elderly persons, persons with disabilities, and low income individuals. These programs supplement existing transportation services in urbanized, small urban, and rural areas where such services are insufficient, or inappropriate for these persons. The list of Non-Profit Transportation Providers vary annually, depending on applicant submissions.

#### ***DRPT Action***



DRPT annually reviews the Title VI activities of Non-Profits Transportation Providers. The following items are considered in the review and are reported to the FTA in DRPT's annual Title VI update.

- Strategies used to ensure that all components of the transportation planning process comply with Title VI;
- Whether a demographic profile of the service area that includes identification of minority and low-income populations has been developed.
- Whether a process has been developed to identify the needs of minority and low-income populations and whether demographic information has been used to assess the distribution of benefits across these groups;
- Whether there is an analytical process in place to assess the benefits/burdens of transportation system investment on minority and low-income populations, and what data source and tools are used to support such an analysis;
- Whether there is a public involvement strategy for engaging minority and low-income populations in transportation decision-making and reducing participation barriers;
- Whether the public involvement process is routinely evaluated and whether any efforts were made to improve the process, especially with regard to minority and low-income populations;
- Efforts made to engage minority and low-income populations in the public outreach effort and public outreach efforts made to utilize media targeted to these groups;
- Methods used to ensure that issues/concerns raised by minority and low-income populations as well as other affected groups are considered in the decision-making process;
- Number of consultant planning agreements awarded and the dollar value; number of female and minority-owned firms with dollar value;
- Methods used to encourage the use of female and minority planning contractors and subcontractors;
- Status of any Title VI complaints received regarding transportation planning or the public involvement process; and

- Any significant accomplishments made during the review period.

## **PROGRAM AREA MONITORING AND REVIEW**

It is the responsibility of DRPT to promote compliance with Title VI of the Civil Rights Act of 1964. The Title VI Compliance Officer conducts Title VI reviews and monitors program areas for compliance.

Each of the following areas will be monitored by the Title VI program for compliance with Title VI requirements (not all inclusive):

- a. Advertisements
- b. Bid proposals
- c. Contracts and subcontracts
- d. Title VI reports, issues, and complaints
- e. Public meeting/transcripts
- f. Title VI contract provisions and other legal documents
- g. DBE Utilization

## **DISCRIMINATION COMPLAINT PROCEDURES - HANDLING, TRACKING, RESOLVING, AND REPORTING INVESTIGATIONS/ COMPLAINTS**

Any individual may exercise his or her right to file a complaint with DRPT if that person believes that s/he or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. DRPT will make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures, as described below. All Title VI complaints and their resolution will be logged as described under "Data collection" and reported annually (in addition to immediately).

DRPT did not have any Title VI complaints, investigations, or lawsuits in the last three years. During DRPT's Title VI Audit conducted August 30-September 1, 2011, the auditors requested to see DRPT's call log. The log was shown to the Auditors at that time by DRPT's Communications staff, was approved, and did not result in a finding during the Audit. Since that time, DRPT has had a complete turnover in Communications staff and the call log document cannot be located for the last three year period. DRPT now has in place a call log which is maintained on a shared server so this sort of occurrence will not happen in the future. Please see our current call log at

Appendix F. This log does contain one Title VI complaint which is currently in the early investigation phase.

Should any Title VI investigations be initiated by FTA, or any Title VI lawsuits be filed against DRPT, the agency will follow these procedures:

# Sample Nondiscrimination Complaint Procedures

## Overview

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, and the Civil Rights Restoration Act of 1987, relating to any program or activity administered by DRPT, as well as to subrecipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law. These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Compliance Officer may be utilized for resolution. The Title VI Compliance Officer will make every effort to pursue a resolution to the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

## *Procedures*

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with DRPT's Title VI Program Compliance Officer. A formal complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. The complaint must meet the following requirements.
  - a. Complaint shall be in writing and signed by the complainant(s).
  - b. Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).
  - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident.
  - d. Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. The complainant is required to mail a signed, original copy of the fax or e-mail transmittal for DRPT to be able to process it.
  - e. Allegations received by telephone will be reduced to writing and provided to complainant for confirmation or revision before processing.

- f. A complaint form (see Appendix G) will be forwarded to the complainant for him/her to complete, sign, and return to DRPT for processing.
2. Upon receipt of the complaint, the Title VI Compliance Officer will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. In cases where the complaint is against one of DRPT's subrecipients of federal funds, DRPT will assume jurisdiction and will investigate and adjudicate the case. Complaints against DRPT will be referred to FTA or the appropriate Federal Agency for proper disposition pursuant to their procedures.
3. In order to be accepted, a complaint must meet the following criteria:
  - a. The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
  - b. The allegation(s) must involve a covered basis such as race, color, or national origin.
  - c. The allegation(s) must involve a program or activity of a federal-aid recipient, subrecipient, or contractor.
4. A complaint may be dismissed for the following reasons:
  - a. The complainant requests the withdrawal of the complaint.
  - b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
  - c. The complainant cannot be located after reasonable attempts.
5. Once DRPT decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within seven calendar days. The complaint will receive a case number and will then be logged into DRPT's records identifying its basis and alleged harm.
6. In cases where DRPT assumes the investigation of the complaint, DRPT will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 10 calendar days from the date of DRPT written notification of acceptance of the complaint to furnish his/her response to the allegations.
7. DRPT's final investigative report and a copy of the complaint will be forwarded to FTA (or appropriate Federal Agency) and affected parties within 60 calendar days of the acceptance of the complaint.
8. DRPT will notify the parties of its final decision.

9. If complainant is not satisfied with the results of the investigation of the alleged discrimination and practices the complainant will be advised of their right file a complaint with FTA.

#### **Monitoring Title VI Complaints**

As part of the complaint handling procedure, the Title VI Compliance Officer investigates possible inequities about which the complaint was filed. If inequities are discovered during this review, options for reducing the disparity are explored, and changes are planned if needed.

In addition to the investigation following an individual complaint, the Title VI Compliance Officer periodically reviews all complaints received to determine if there may be a pattern. At a minimum, this review is conducted as part of preparing the Annual Report and Update for submission to the FTA.

## **DATA COLLECTION AND REPORTING PROCEDURES**

#### **Data Collection**

To ensure that Title VI reporting requirements are met, DRPT maintains:

- A log and database of Title VI complaints received. The investigation of and response to each complaint is tracked within the database.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities. The agency maintains the following records related to public outreach and involvement:
  - Files with copies of materials published or distributed for each planning project, as well as all news releases, public service announcements, surveys, and written summaries of in-person outreach events.
  - A log/database of public outreach and involvement activities, including dates, planning project, type of activity, LEP assistance requested/provided, target audience, number of participants, and location of documentation within paper files.

Maintenance of these records is the responsibility of the Title VI Compliance Officer.

## Annual Report and Triennial Updates

### *Annual Reporting*

DRPT submits an annual report to the FTA that documents any Title VI investigations/complaints/lawsuits during the preceding 12 months.

### *Triennial Reporting*

Every three years, DRPT submits to FTA, a complete list of the investigations/complaints/lawsuits received in the prior three years, a summary of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities, and any updates to this Title VI plan.

### *Updates to the Title VI Plan*

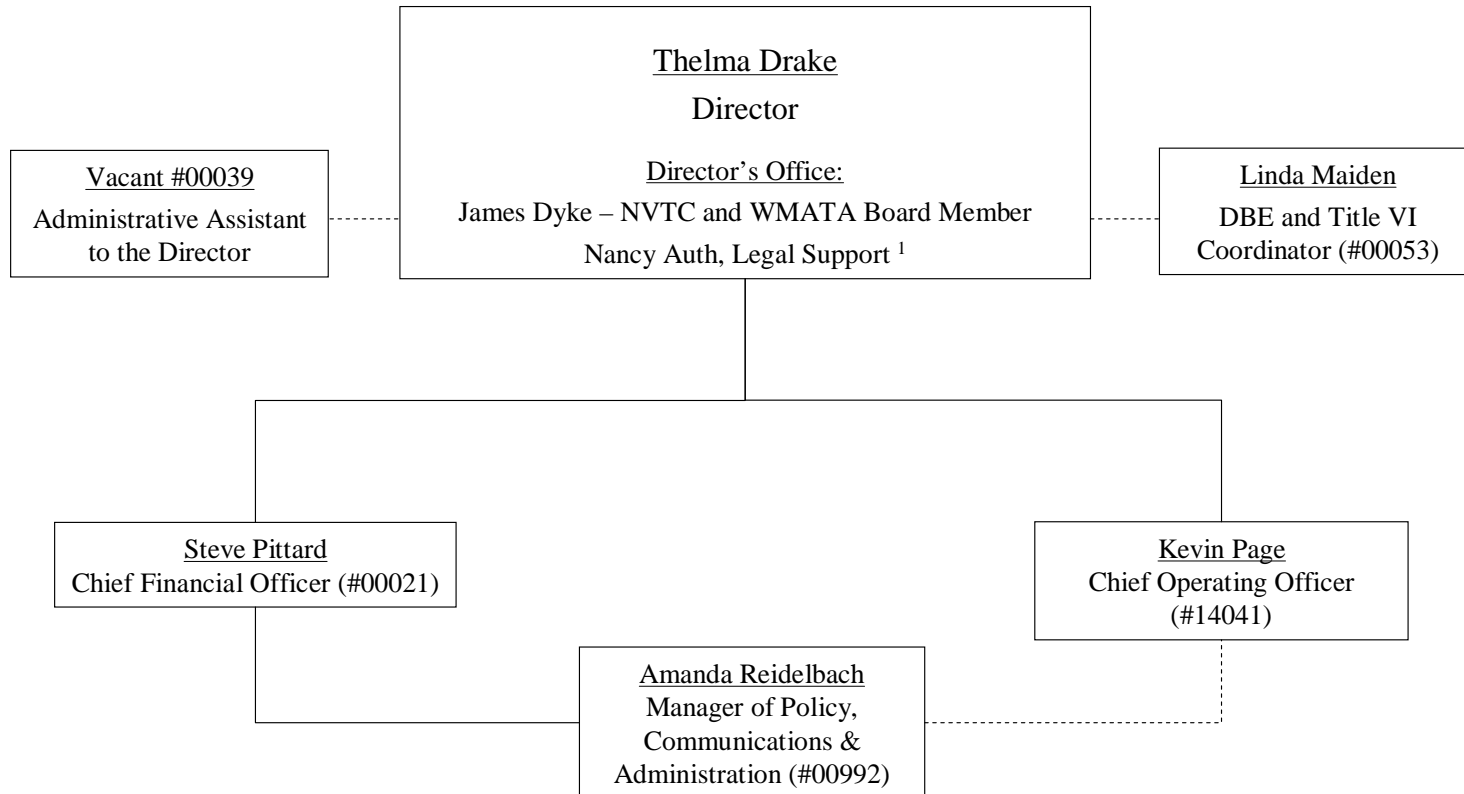
As noted above, every three years DRPT submits to FTA an update to this Title VI Plan. The triennial Title VI update includes the following items, or a statement to the effect that these items have not been changed since the previous submission, indicating date.

- A copy of any compliance review report for reviews conducted in the previous three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations. Please note that DRPT has not had a civil rights compliance review within the last three year period by an agency other than the Federal Transit Administration.
- DRPT's LEP plan
- DRPT's procedures for tracking and investigating Title VI complaints
- A complete list of Title VI investigations, complaints, or lawsuits filed with DRPT since the last submission
- A copy of DRPT's agency's notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint

# Appendix A: DRPT Organizational Chart

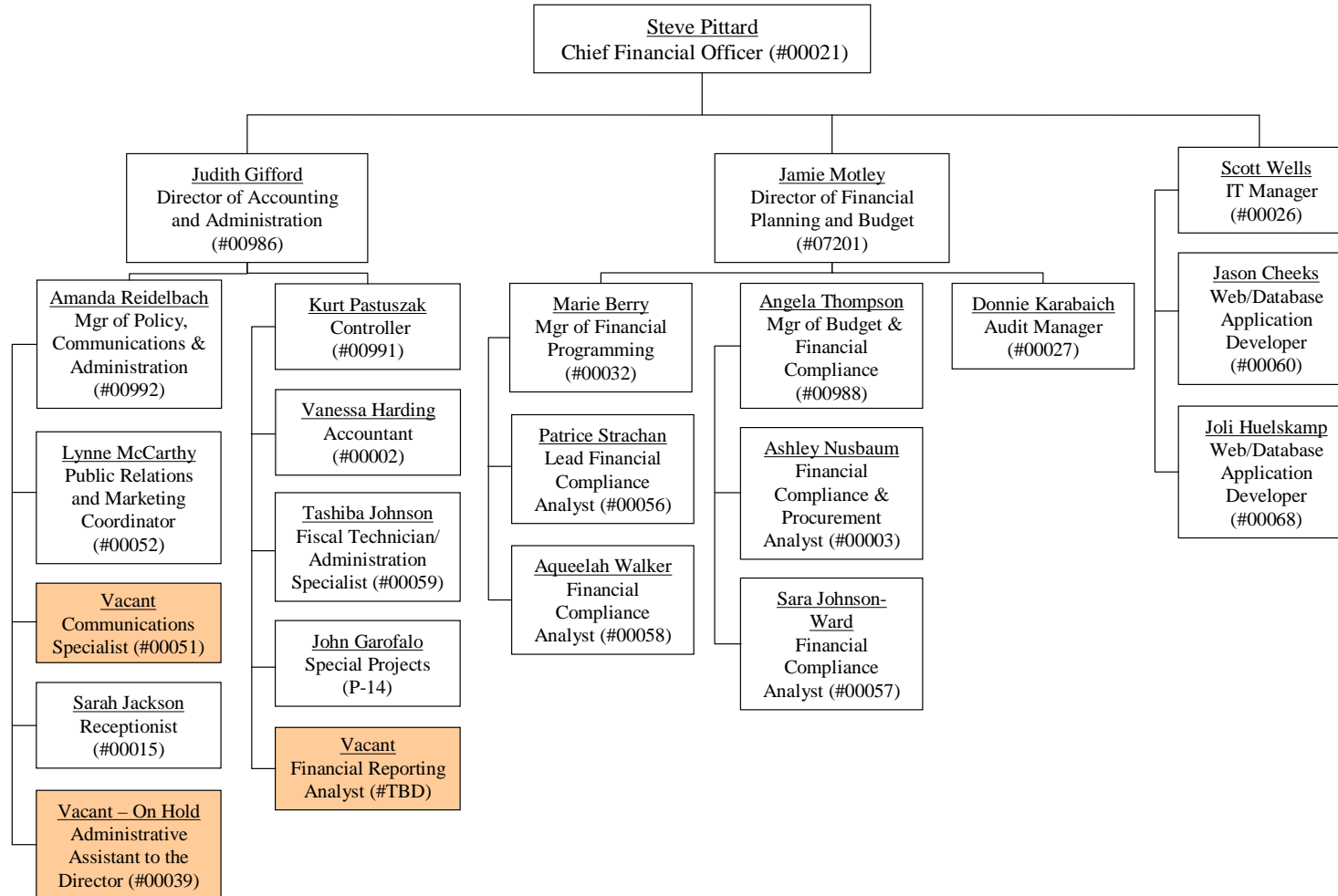


# Virginia Department of Rail and Public Transportation Organization Chart

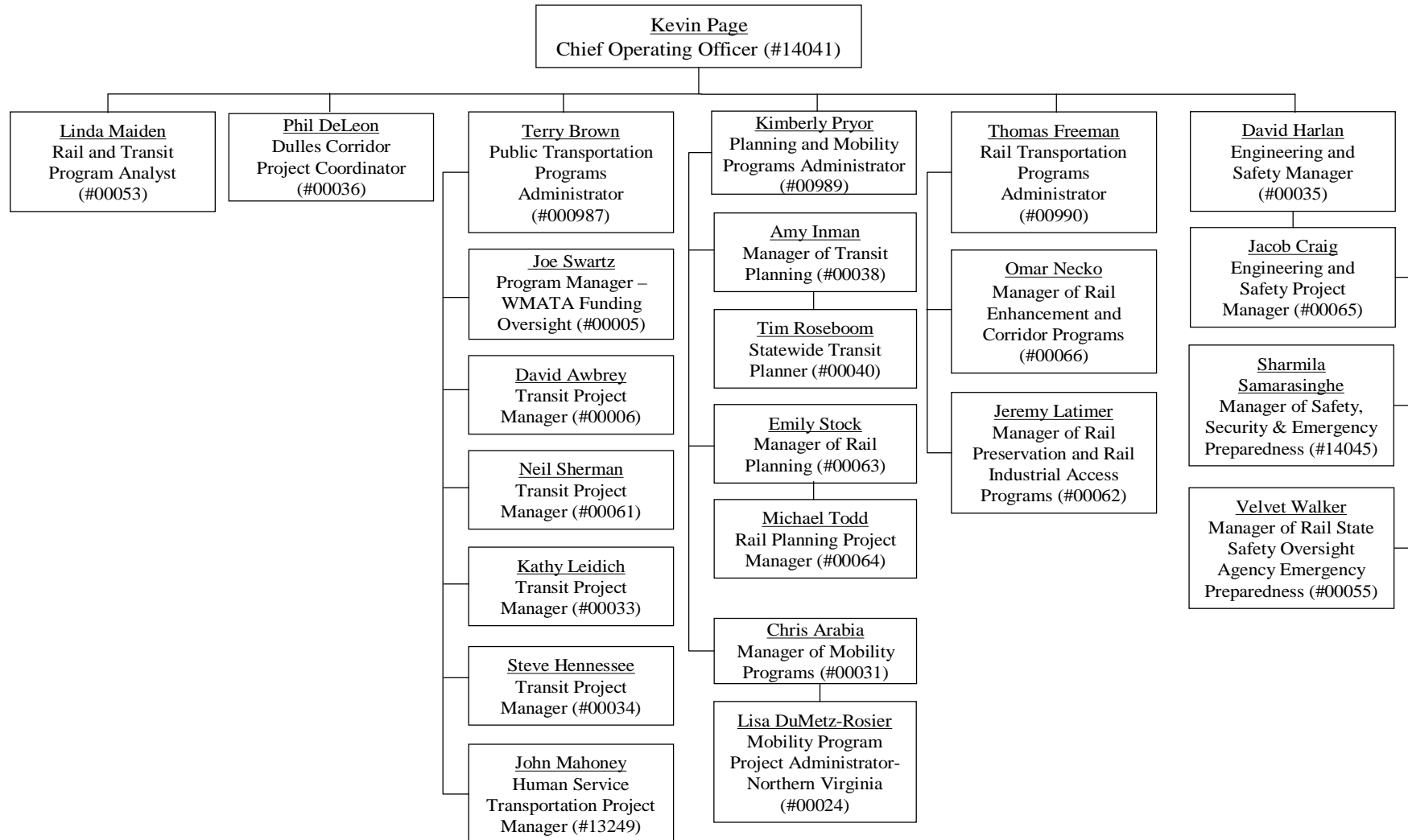


<sup>1</sup>Office of the Attorney General

# Finance and Administration



# Rail and Transit



# Appendix B: DRPT PUBLIC PARTICIPATION PLAN

## **Virginia Department of Rail and Public Transportation**

### **Public Participation Plan**

The Department of Rail and Public Transportation participates in public hearings with the Virginia Department of Transportation. It was recently brought to our attention that VDOT is not meeting our Title VI need. To stay in conformance with FTA's regulations regarding Title VI, DRPT will work individually with the media to alert the public on upcoming events. DRPT will make a concerted effort to notify newspapers and other media outlets to ensure the public is aware of upcoming meetings with emphasis on those areas with high minority and low-income populations. DRPT will list meeting dates and times on our website. When not cost prohibitive, DRPT will publish translated announcements of public meetings in minority newspapers. On DRPT's website, the Notice to Beneficiaries and the Complaint Process will be translated into Spanish. We will also include a note in Spanish to contact the DRPT Public Relations Office ([drptpr@drpt.virginia.gov](mailto:drptpr@drpt.virginia.gov)) for information regarding translation services.

#### **Vital Document Translation**

DRPT will take reasonable steps to ensure that LEP persons have meaningful access to written translation of vital documents using pictograms or universal icons when necessary or applicable. Vital documents commonly include information which is critical or required to participate in a benefit from DRPT, which could include:

- Notices advising LEP persons of the availability of free language assistance
- Any document or outreach material that meets the definition of a vital document
- Notices appearing in areas with specific high LEP populations
- Title VI and constituent complaint forms
- Notices of Public Meetings
- Notices of Grant Application dates
- Public Notices
- Brochures
- Media Releases

#### **Public Meetings**

In order to reach the highest number of minority and/or low-income people when planning public meetings, DRPT and/or its subrecipients shall attempt to hold meetings near bus lines or other modes of public transportation or in neighborhoods identified as having a high percentage of minority/low-income population. These

locations will be given highest priority depending on availability of meeting space and/or cost of facility.

Our public meetings are held in the spring and fall of each year. SYIP meetings are held in four regions across the state (Northern Virginia, Hampton Roads, Roanoke, and Southwest Virginia) in the spring of the year. The fall Multimodal Transportation meetings are held in nine regions across the state (Lynchburg, Bristol, Fredericksburg, Hampton Roads, Northern Virginia, Salem, Staunton, Culpeper, and Richmond). The meetings begin at 6:00 p.m. after the regular workday, with the exception of the Northern Virginia meetings which begin at 7:00 p.m. due to the high volume of traffic in the Northern Virginia area. VDOT plans and arranges these meetings for the Transportation Secretariat agencies, including DRPT. These meetings are also advertised by VDOT. We have recently found VDOT lacking in their effort to communicate with the Title VI population, however, it is unreasonable to hold separate public meetings regarding the same topic, so in the future, DRPT plans a more rigorous advertising campaign of its own surrounding these meetings.

For meetings that DRPT and its subrecipients plan, locations, facilities, and meeting times that are convenient and accessible to minority and low-income communities will be used. An example of a public meeting which DRPT planned recently, although a Rail Project and subject to FRA instead of FTA funding, is a Public Roundtable DRPT held in Newport News in early April 2012. This meeting was held within the affected neighborhood at the local church. This location was chosen to give the minority community greater access to the meeting. DRPT also held several public meetings in Northern Virginia regarding the I66 Environmental Impact Study. These meetings were held after work hours and both meetings were held near public transportation. The meetings were advertized using the Virginia Press Services, Inc., Ad Network. Super NoVA Public Meetings were held in Northern Virginia in February 2012 at local Community Centers and a local Church. The meetings were advertized using the Virginia Press Services, Inc., Ad Network and flyers were posted in the Community Centers. Where technology exists, DRPT will also have the meetings taped and have the audio posted to our website for access by a larger percentage of the population. We are also investigating streaming the meetings live to provide more widespread access to the public. DRPT will request that fliers announcing these meetings be placed in locations such as DMV field offices, local libraries, and with local citizen groups.

DRPT's goal is to conduct all public participation activities in locations that are fully accessible to public transportation and near minority/low-income communities. To reach the largest number of minority and low-income communities throughout the Commonwealth, a geographically focused public participation program will achieve the outcomes described in this plan. In addition to traditional methods of communication, DRPT will utilize strategies recommended by community members for a specific neighborhood or population group. By partnering with community groups and local chambers of commerce, DRPT can cost-effectively extend its reach and help partner

organizations provide information that is of interest to groups they represent. If needed, DRPT should provide translated text. DRPT should maintain communication with community partners so it is aware of local publication schedules. Although many times cost prohibitive, DRPT will work to translate public hearing announcements into different languages depending on meeting location and census data available for each geographic region in the Commonwealth.

Meeting formats will be tailored to achieve specific public participation goals such as sharing information; answering questions; establishing priorities; and reaching a consensus.

### **Communications**

DRPT will establish and maintain active work relationships with all relevant local media, including minority-based media in order to communicate pertinent information to DRPT subrecipients and the public. DRPT will coordinate with individual institutions and organizations while implementing community-based public involvement strategies to reach out to members in affected minority and/or low income communities. DRPT shall also provide opportunities for public participation through alternative means other than public meetings or written communication; i.e., personal interview or use of audio or video recording to capture comments and posting that audio/video on DRPT's website. DRPT shall utilize the following communication tools:

- DRPT website ([www.drpt.virginia.gov](http://www.drpt.virginia.gov))
- Amtrak Virginia Facebook page (when appropriate)
- Regular communications with media
- Focus groups
- Partnerships with community based organizations
- Communication with elected officials
- Press briefings and news releases

DRPT uses the Classified Ad Network of the Virginia Press Service to give public notice for things such as the opening of our grant application cycle. The Classified Ad Network sends our ads to 89 newspapers across Virginia. In November 2011, for our grant application cycle, the ad was translated into Spanish and ran in *El Tiempo Latino*.

### **Notices**

Notices will include a statement on how to request translation and interpretive services. DRPT will place notices in minority and low-income communities using locations such as DMV field offices, local libraries, with local citizen groups, and in areas identified by local citizen groups as being accessed by a high volume of the minority and low-income population.

### **Implementation Plan for Subrecipients**

Subrecipients must put procedures into place to involve minority, low-income, and limited English proficiency populations in its public involvement activities. These procedures must be in compliance with FTA regulations. Subrecipients must submit their procedures to DRPT with their Title VI plan. Eligibility for funding through DRPT is contingent on each subrecipient participating in the Federal Title VI program and ensuring that they are in compliance with FTA regulations.





## Network Classifieds List

Contact: **Adriane Long**, (804) 521-7585, [adrianel@vpa.net](mailto:adrianel@vpa.net)

NEWSPAPER	DAY	CIRCULATION
Washington County News, Abingdon	Wednesday	2,534
The Metro Herald, Alexandria	Thursday	5,050
Amelia Bulletin Monitor, Amelia	Thursday	10,237
New Era-Progress, Amherst	Thursday	2,688
Herald-Progress, Ashland	Thursday	4,560
The Post, Big Stone Gap	Thursday	2,567
The Bland County Messenger	Wednesday	1,906
Cave Spring Connection	Friday	3,500
The Caroline Progress	Thursday	3,388
Bristol Herald Courier	Sunday	30,391
The Daily Progress, Charlottesville	Wednesday	25,406
Charlottesville/Albemarle Tribune	Wednesday	10,000
The News-Messenger, Christiansburg	Saturday	3,405
The Mecklenburg	Sun/Wedns	5,877
The News-Progress, Chase City	Wednesday	4,104
The News Patriot, Colonial Heights	Thursday	5,000
Virginian Review, Covington	Thursday	6,796
Culpeper Star-Exponent	Wednesday	6,132
Danville Register & Bee	Friday	18,001
The North Fork Journal, Harrisonburg	Wednesday	12,450
The Shenandoah Journal, Harrisonburg	Wednesday	10,250
The Dickenson Star	Wednesday	3,946
The Monitor, Dinwiddie	Wednesday	4,300
The Valley Banner, Elkton	Thursday	3,416
Independent-Messenger, Emporia	Sun/Wedns	4,788
The Farmville Herald	Wednesday	7,308
The Fincastle Herald	Wednesday	6,742
The Floyd Press	Thursday	4,824
Tidewater News, Franklin	Wednesday	3,157
The Free Lance-Star, Fredericksburg	Tuesday	41,824
The Warren Sentinel, Front Royal	Thursday	3,157

The Gazette, Galax	Friday	7,918
The Virginia Mountaineer, Grundy	Thursday	8,180
Daily News Record, Harrisonburg	Tuesday	27,821
Nuevas Raices, Harrisonburg	Wednesday	14,000
Rocktown Weekly, Harrisonburg	Thursday	13,977
The Northumberland Echo, Heathsville	Wednesday	2,116
The Carroll News, Hillsville	Wednesday	5,586
The Hopewell News	Friday	4,476
The Declaration, Independence	Wednesday	1,992
The Southside Messenger, Keysville	Thursday	2,006
Rappahannock Record, Kilmarnock	Thursday	7,592
Brunswick Times-Gazette, Lawrenceville	Wednesday	2,503
The Lebanon News	Wednesday	5,486
The News-Gazette, Lexington	Wednesday	7,637
The Central Virginian, Louisa	Thursday	8,208
Nelson County Times, Lovingston	Thursday	2,632
Page News & Courier, Luray	Thursday	7,568
The News & Advance, Lynchburg	Tuesday	27,374
Smyth County News & Messenger, Marion	Wednesday	4,408
Martinsville Bulletin	Tuesday	14,738
The Shenandoah Valley Hit, McGaheysville	Friday	2,100
The Recorder, Monterey	Thursday	5,000
Westmoreland News, Montross	Wednesday	3,315
The New Castle Record	Wednesday	1,503
The Coalfield Progress, Norton	Tuesday	5,600
Virginian Leader, Pearisburg	Wednesday	5,437
The Progress-Index, Petersburg	Tuesday	12,181
The Prince George Journal	Thursday	1,300
The Southwest Times, Pulaski	Tuesday	4,697
Radford News Journal	Saturday	1,459
Clinch Valley News, Richlands	Wednesday	1,896
Richlands News-Press	Wednesday	3,867
Richmond Times-Dispatch	Sunday	167,174
The Richmond Voice	Wednesday	33,895
The Roanoke Times	Friday	75,740
Salem Times-Register	Thursday	3,735
The Smithfield Times	Wednesday	6,345
Gazette Virginian, South Boston	Wednesday	9,880
News & Record, South Boston	Thursday	4,701
The South Hill Enterprise	Wednesday	5,836
Clinch Valley Times, St. Paul	Thursday	1,839
The News Leader, Staunton	Wednesday	14,510
Northern Virginia Daily, Strasburg	Tuesday	13,225
The Enterprise, Stuart	Wednesday	5,840
Suffolk News Herald	Tuesday	3,071
Rappahannock Times, Tappahannock	Thursday	5,000
Southside Sentinel, Urbanna		

Tazewell County Free Press	Thursday	4,747
The Vinton Messenger	Wednesday	13,500
Sussex-Surry Dispatch, Wakefield	Thursday	1,140
The Northern Neck News, Warsaw	Wednesday	3,325
The Washington Times	Wednesday	4,896
The News Virginian, Waynesboro	Sunday	33,792
The Winchester Star	Sunday	19,375
News & Messenger, Woodbridge	Thursday	19,964
Shenandoah Valley Herald, Woodstock	Wednesday	14,078
Wytheville Enterprise	Thursday	2,905
York Town Crier/Poquoson Post	Tuesday	5,676
	Thursday	3,190
		Total Circulation: 1,128,067

# Appendix C: DRPT TITLE VI SECTION OF TRIENNIAL REVIEW WORKBOOK

## TITLE VI--NONDISCRIMINATION IN THE DELIVERY OF SERVICE

FTA and DRPT prohibit discrimination on the grounds of race, color or national origin in the delivery of public transit services. FTA also prohibits discrimination on the grounds of low-income status. Title VI complaints must be reported to DRPT within 24 hours of receipt of the complaint.

The following questions are designed to determine whether the service provided meets Title VI requirements.	
1. When considering changes in service, have you ensured that Title VI was taken into consideration?	
2. What is the racial make up of your service area?	
3. Have you designated a staff person as your Title VI Compliance Officer? Who is it?	
4. Have you signed and submitted your annual Title VI certification and assurance?	
5. Do you provide service to areas with minority populations? Is it the same level and quality of service that is provided in areas without minority populations?	
6. Please describe the location of transit services and facilities. Have you ensured that decisions on the location of transit services and facilities are made without regard to race, color, creed, national origin, sex, age, or disability?	
7. Do you have written Title VI Complaint Procedures? (Reviewer will verify)	

<p>8. Have any complaints concerning discrimination in the delivery of service been received since the last review or last grant application? How do you document complaints?</p> <p>If yes, how were the complaints identified and resolved?</p> <p>Did you report the complaints to DRPT within 24 hours of receipt of the complaint?</p> <p><i>Title VI complaints must be reported to DRPT within 24 hours of receipt of the complaint.</i></p>	
<p>9. How are individuals provided opportunities to participate in the transit planning and decision-making processes without regard to race, color, creed, national origin, sex, age, or disability?</p> <p>Have representatives of these groups expressed a need for transportation improvements? If yes, please describe.</p>	
<p>How do you notify the public of their rights under Title VI?</p> <p>How is the information disseminated?</p> <p>Do these methods go beyond posting on the agency's website?</p> <p>Does the notice include:</p> <ul style="list-style-type: none"> <li>– the statement that the subrecipient operates the program without regard to race, color, or national origin,</li> <li>– a description of how the public can request additional information, and procedures the public should follow to file a discrimination complaint?</li> </ul>	

10. Does the subrecipient have written procedures for investigating and tracking Title VI complaints? Is this information made available to the public upon request?	
11. Has the subrecipient trained its staff on the requirements of Title VI? Is this training provided periodically?	
12. What measures or practices does the subrecipient use to seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities? Do the measures provide meaningful, early and continuous opportunities for public involvement?	
<p style="text-align: center;"><b>LIMITED ENGLISH PROFICIENCY</b></p> <p>Grantees are required to assess their service area to ensure meaningful access for Limited English Proficient persons.</p>	
13. Have you conducted a Limited English Proficiency Assessment and/or Four Factor Analysis? Do you have a Limited English Proficiency Plan?	
14. What products and/or services do you offer to Limited English Proficiency persons?	

\*Questions in red above were added after the FTA Audit of DRPT on August 30-September 1, 2011.

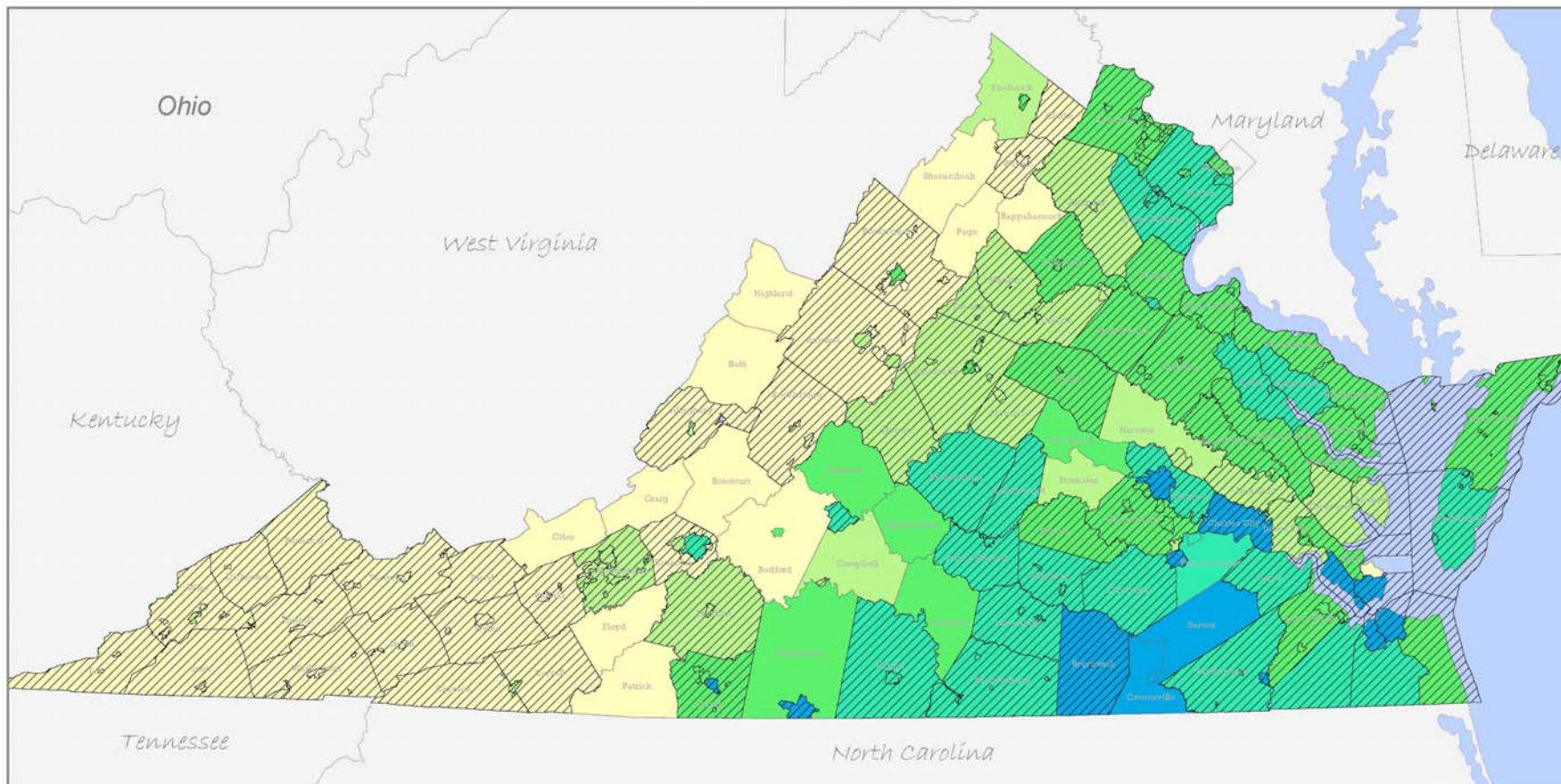
# Appendix D: DRPT SUMMARY OF SUBRECIPIENT TRIENNIAL REVIEW FINDINGS



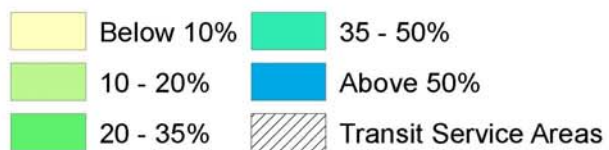
Triennial Reviews  
Title VI Component

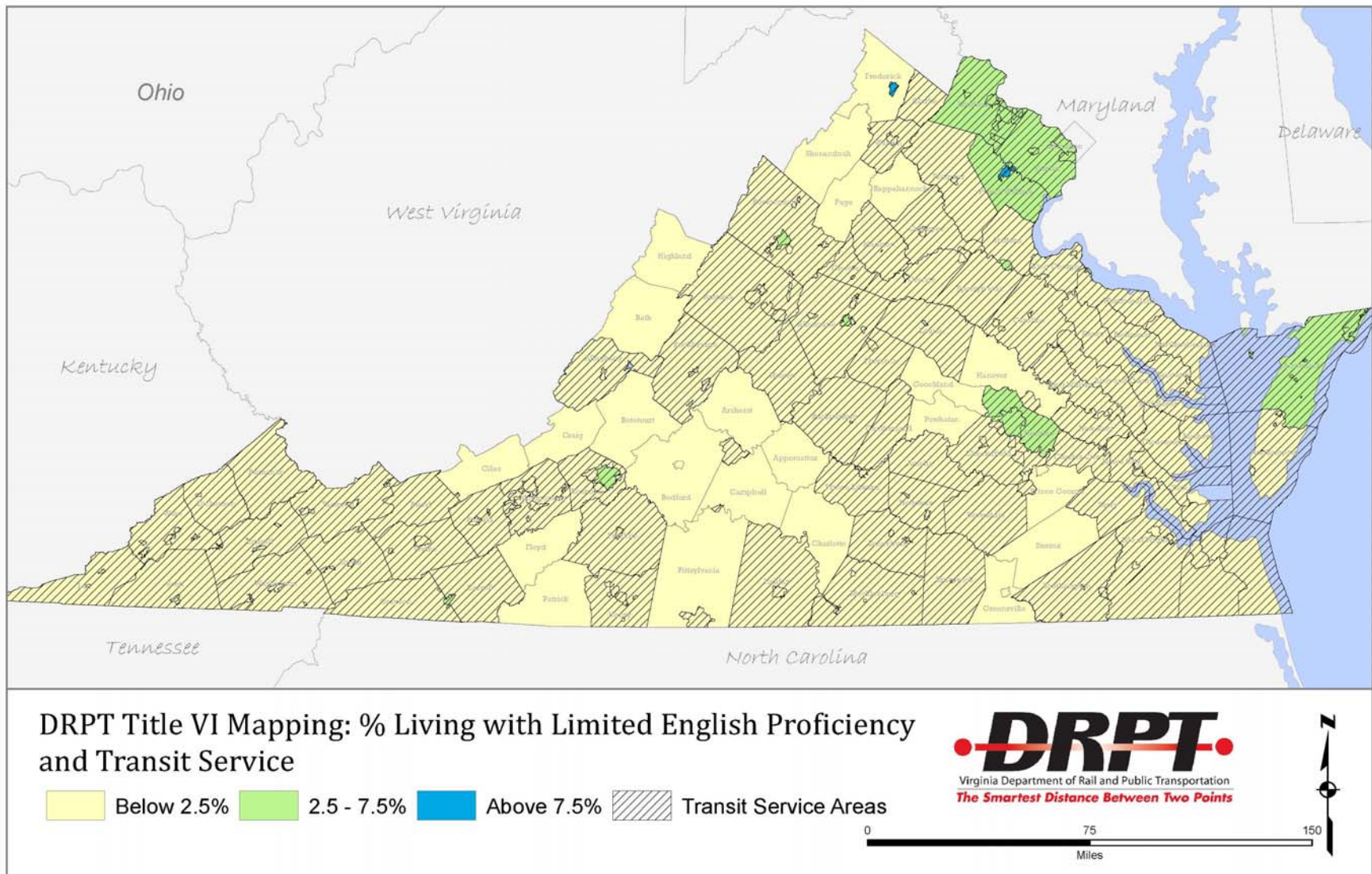
<b>Date Conducted</b>	<b>Grantee</b>	<b>Title VI Findings</b>	<b>Corrective Action Taken</b>
11/3-4/2010	Bay Transit	None	
5/3/2011	Blackstone Area Bus System	None	
5/19/2010 and 7/21/2010	Town of Chincoteague / Chincoteague Pony Express Trolley Service	None	
12/8-9/2010	Farmville Area Bus	None	
10/6-7/2010	FRED (King George and Caroline)	None	
6/2-3/2010	Greene County Transit	None	
10/21-22/2010	JAUNT	None	
9/14-15/2010	Lake Country Area Agency on Aging	No customer complaint resolution procedures.	Implemented a notebook for complaints to be recorded along with the resolution of each complaint. Implemented a notebook for denial of ride along with the reason for denial.
7/19-20/2010	STAR Transit	None	
11/17-18/2010	Virginia Regional Transit	None	

Appendix E:  
DRPT Maps – Percent of  
Minority Population, Percent  
LEP, and Percent Low  
Income – with Transit  
Service by County

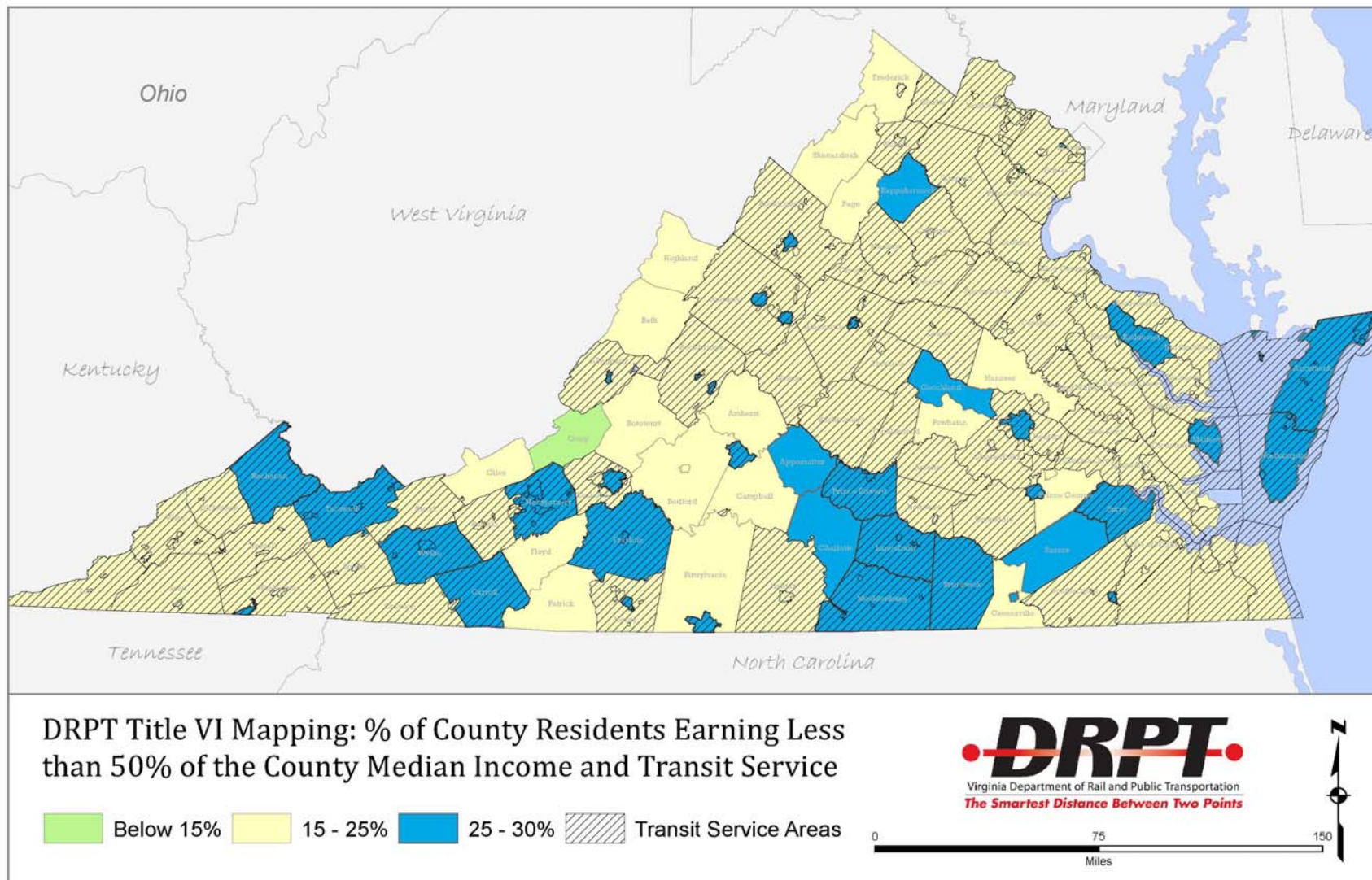


# DRPT Title VI Mapping: % Minority Population and Transit Service









# Appendix F: DRPT CALL AND COMPLAINT LOG

## DRPT CALL AND COMPLAINT LOG

2012

<b>DATE / TIME</b>	<b>NAME &amp; CONTACT INFO</b>	<b>COMPLAINT SUMMARY</b>	<b>ACTION TAKEN</b>	<b>STATUS</b>	<b>DBE</b>	<b>TITLE VI</b>
9/7/12; 9:00 a.m.	William Johnson 757-268-7558	HRT Complaint: Mr. Johnson is a bus driver and he feels that HRT is violating OSHA standards by not giving drivers the minimum 8 hour break between shifts. He indicates that the Supervisors are encouraging drivers to waive their right to the 8 hour rest period. And asked DRPT for guidance on how to proceed as when he called OSHA they told him it was a DOT issue.	Linda Maiden took the call. After talking to Mr. Johnson, Linda called VDOT and asked for a referral. They indicated that this was not a State DOT issue but the USDOT handled it. They gave Linda a contact number 800-832-5660. Linda called Mr. Johnson back and relayed the information to him.	Complete as of 9/7/12, 11:30 a.m.	No	No

<b>DATE / TIME</b>	<b>NAME &amp; CONTACT INFO</b>	<b>COMPLAINT SUMMARY</b>	<b>ACTION TAKEN</b>	<b>STATUS</b>	<b>DBE</b>	<b>TITLE VI</b>
9/25/12 1:00 p.m.	Jarrold Martin 423-217-8052 602 E. River Road Big Stone Gap, VA 24219	Mr. Martin called to complain about MEOC. He feels he was discriminated against because he is low income and of African American descent. He said they are frequently late or don't show up after he calls 24 hours in advance to make a ride appointment. He also indicated that he is a college student and needs the service to get to school. He said he has been left at school because they didn't see him waiting. He also indicated that he has been suspended from riding the buses at MEOC because of several instances of curse and abuse toward the drivers, dispatcher, and an office worker. He said that his conversations were recorded and then played back for an aunt. He wants to file a complaint	Discussed with Project Manager, Neil Sherman who in turn called MEOC to get background on this constituent.	Linda Maiden returned Mr. Martin's call and told him that due to the nature of his complaint that we were going to forward him the Title VI Formal Complaint form to fill out and return to DRPT. The form was mailed to him on Friday afternoon, September 28, 2012. Linda told Mr. Martin that when we received the completed/ signed form, we would proceed with an investigation.  <b>10/4/12 UPDATE</b> Agency Director of MEOC called Neil Sherman and	NO	Yes



				<p>reported that he had interviewed the bus drivers on Mr. Martin's route and was told that Mr. Martin was verbally abusive to them as well as cursed at them. He also refused to pay his fares. The transit manager had been taking Mr. Martin's calls and scheduling his rides as part of the plan to keep him as a rider, however, after Mr. Martin cursed at the dispatcher, drivers, and Transit manager's office staff he was suspended.</p> <p><b>10/5/12</b> Status Update- Awaiting return of written complaint form from Mr. Martin.</p> <p><b>10/16/12</b> DRPT</p>		
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				<p>discrimination complaint form received from Mr. Martin.</p> <p><b>10/23/12</b> Letter sent to Mr. Michael Wampler, MEOC, with a copy of Mr. Martin's complaint. Letter to Mr. Wampler instructs him to investigate the complaint and respond to DRPT.</p> <p><b>11/1/12</b> Received response from Mr. Michael Wampler, MEOC (letter dated 10/31/12). Mr. Wampler's letter presented a timeline of contact with Mr. Martin and documented instances of inappropriate behavior by Mr. Martin.</p>		
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				<p><b>11/2/12</b> Letter from DRPT agency head Thelma Drake to Mr. Martin on the resolution of his case in which DRPT informed him that after reviewing detailed the information provided MEOC, DRPT finds no instance of discrimination based on race. Informed Mr. Martin of his rite to file a complaint with FTA should he so desire.</p>		
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<b>DATE / TIME</b>	<b>NAME &amp; CONTACT INFO</b>	<b>COMPLAINT SUMMARY</b>	<b>ACTION TAKEN</b>	<b>STATUS</b>	<b>DBE</b>	<b>TITLE VI</b>
10/3/12; 1:45 p.m.	Clifton Strickland 757-477-8600 Norfolk, Virginia	Called to complain about the excessive fare (almost \$200) to ride the new Amtrak service from Norfolk to DC.	Referred the call to Kevin Page. Kevin called Mr. Strickland on 10/3/12 at 3:00 p.m. after looking up the fares on the AMTRAK website. We found the fare Mr. Strickland was referring to was on the first day of service (12/12/12) and was \$100 Norfolk to DC and \$89 DC to Norfolk. This inflated price was due to the limited seating availability on the train. Kevin informed Mr. Strickland that the regular fare would be in the \$38 range each way (according to the	Mr. Strickland was satisfied with Kevin's call and will use the service to travel to DC for business.	No	No

			AMTRAK website).			
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# Appendix G: Discrimination Complaint Form

## DRPT Discrimination Complaint Form

Please provide the following information in order to process your complaint. Assistance is available upon request. Complete this form and mail or deliver to:

Title VI Compliance Officer, DRPT, 600 E. Main Street, Suite 2102, Richmond, VA 23219.

You can reach our office Monday-Friday from 8:00am to 4:30pm at (804) 786-4440, or you can email the DRPT Title VI Compliance Officer at [drptpr@drpt.virginia.gov](mailto:drptpr@drpt.virginia.gov).

---

**Complainant's Name:** \_\_\_\_\_

**Street Address:** \_\_\_\_\_

**City:** \_\_\_\_\_ **State:** \_\_\_\_\_ **Zip Code:** \_\_\_\_\_

**Telephone No. (Home):** \_\_\_\_\_ **(Business):** \_\_\_\_\_

**Email Address:** \_\_\_\_\_

**Person discriminated against (if other than complainant):**

**Name:** \_\_\_\_\_

**Street Address:** \_\_\_\_\_

**City:** \_\_\_\_\_ **State:** \_\_\_\_\_ **Zip Code:** \_\_\_\_\_

**Telephone No.:** \_\_\_\_\_

**The name and address of the agency, institution, or department you believe discriminated against you.**

**Name:** \_\_\_\_\_

**Street Address:** \_\_\_\_\_

**City:** \_\_\_\_\_ **State:** \_\_\_\_\_ **Zip Code:** \_\_\_\_\_

**Date of incident resulting in discrimination:** \_\_\_\_\_

**Describe how you were discriminated against. What happened and who was responsible? If additional space is required, please either use back of form or attach extra sheets to form.**

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Does this complaint involve a specific individual(s) associated with DRPT? If yes, please provide the name(s) of the individual(s), if known.

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Where did the incident take place?

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Are there any witnesses? If so, please provide their contact information:

Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Did you file this complaint with another federal, state or local agency; or with a federal or state court?

☐ Yes

☐ No

If answer is Yes, check each agency complaint was filed with:

☐ Federal Agency

☐ Federal Court

☐ State Agency

☐ State Court

☐ Local Agency

☐ Other

Please provide contact person information for the agency you also filed the complaint with:

Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Date Filed: \_\_\_\_\_

Sign the complaint in the space below. Attach any documents you believe support your complaint.

\_\_\_\_\_  
Complainant's Signature

\_\_\_\_\_  
Signature Date